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9 **UNITED STATES BANKRUPTCY COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**
11 **LOS ANGELES DIVISION**

12 In re:

13 CRESTLLOYD, LLC,

14 Debtor and Debtor in Possession.

Case No.: 2:21-bk-18205-DS

Chapter 11 Case

USDC Appeal Case No.: 2:22-CV-02487-MEMF

**APPELLANT'S STATEMENT OF ISSUES TO
BE PRESENTED IN PROTECTIVE CROSS-
APPEAL**

Appeal Docket Entry No.: 275

1 Crestlloyd, LLC, the debtor and debtor in possession in the above referenced bankruptcy case
2 and the appellant in the above referenced cross-appeal (the “Debtor” or “Appellant”), pursuant to
3 Federal Rule of Bankruptcy Procedure Rule 8009(a)(2), hereby submits the following issue to be
4 presented in Appellant’s’ protective Cross-Appeal of the *Order Granting Debtor’s Motion for an*
5 *Order” (1) Approving the Sale of Debtor’s Real Property Free and Clear of all Liens, Claims,*
6 *Encumbrances, and Interests, with the Exception of Enumerated Exclusions; (2) Finding that the*
7 *Buyer is a Good Faith Purchaser; (3) Authorizing and Approving the Payment of Certain Claims from*
8 *Sale Proceeds; (4) Waiving the Fourteen-Day Stay Period Set Forth in Bankruptcy Code Section*
9 *6004(h); and (5) Providing Related Relief* [Dkt. 247] entered March 28, 2022 (the “Sale Order”):

10 (1) Whether the Bankruptcy Court erred in finding that the Debtor could sell its real
11 property free and clear of liens, claims, and interests pursuant to 11 U.S.C. § 363(f)(1), (2), (4) and/or
12 (5).

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14 Dated: April 27, 2022

LEVENE, NEALE, BENDER, YOO
& GOLUBCHIK L.L.P.

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16 By: /s/ Todd M. Arnold
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